

Initial Study/Checklist And Negative Declaration

Prepared for and by

**North Coast Regional
Water Quality Control Board**

**Willits Environmental Remediation Trust
Page Property
4280 Canyon Road
Willits, California
Mendocino County**

Groundwater Extraction and Treatment System

June 15, 2006

**North Coast Regional Water Quality Control Board
5550 Skylane Boulevard, Suite A
Santa Rosa, California 95403**

Initial Study/Checklist and Negative Declaration

This Initial Study/Checklist and Negative Declaration has been prepared in accordance with Title 14, Section 21080C of the Public Resources Code and Section 15070 and 15071 of the California Code of Regulations. The Negative Declaration is proposed for adoption at a meeting of the California Regional Water Quality Control Board, North Coast Region, on August 9, 2006.

Project Title: Groundwater Extraction and Treatment System

Project Location/Address: Page Property, 4280 Canyon Road, Willits, California, Mendocino County (See Figure 1)

Lead Agency: California Regional Water Quality Control Board, North Coast Region, 5550 Skyline Boulevard, Suite A, Santa Rosa, CA 95403

Decision Making Body: California Regional Water Quality Control Board, North Coast Region

Project Applicant: Willits Environmental Remediation Trust, 6016 Princeton Reach Way, Granite Bay, California 95746.

Project Description: The Willits Environmental Remediation Trust (WERT) is proposing to construct a groundwater extraction and treatment system at the Page Property to abate the discharge of groundwater containing hexavalent chromium to Darby Creek, a tributary to Outlet Creek and the Eel River.

The groundwater treatment system consists of an interceptor trench where contaminated groundwater will be extracted, conveyed to a treatment system of two granular activated carbon vessels to remove the hexavalent chromium to below the detection limit of one part per billion (ppb), and the seasonal discharge of highly treated groundwater to Darby Creek.

Environmental Finding: The staff of the Regional Water Board has determined, on the basis of the attached Initial Study/Checklist and the documents and sources referenced therein, that the project described above will not have an impact on the environment, provided that the applicant's Report of Waste Discharge and the related Initial Study/Checklist are included in the project.

Initial Study/Checklist: The Initial Study/Checklist is attached. For more information call Janice Goebel of the Regional Water Board staff at (707) 576-2676.

Mitigation Measures: There are no mitigation measures proposed or needed for this project.

Introduction

This Negative Declaration and Initial Study/Checklist has been prepared so that the Regional Water Board can consider adoption of Waste Discharge Requirements which also serve as a National Pollutant Discharge Elimination System Permit (NPDES) for the proposed groundwater extraction and treatment system. The Regional Water Board proposes to consider adoption of Waste Discharge Requirements Order No. R1-2006-0067 at a Regional Water Board meeting to be held on August 9, 2006. Order No. R1-2006-0067 will allow the WERT to construct and operate the groundwater extraction and treatment system, and discharge highly treated groundwater to Darby Creek.

This report is the Negative Declaration and Initial Study/Checklist required by the State CEQA Guidelines. It was prepared by Janice Goebel of the Regional Water Board. This study uses project information provided by the professional consultants for the Willits Environmental Remediation Trust (WERT).

Existing Facility

The site was a former municipal burn dump, approximately 2.4 acres in size. In the 1940's, the City of Willits acquired land to the east of the City of Willits for use as a municipal landfill. This property is referred to as the Page Property or the Old Willits Landfill. The property is located at 4280 Canyon Road in Willits, Mendocino County, and shown on Figure 1. In the 1940's, municipal waste disposal operations began. The operations included the incineration of waste to reduce the volume of wastes. In the 1950's septage wastes were also disposed at the property. In the late 1960's, liquid waste from chrome plating operations from the former Remco Hydraulics Facility in Willits, and other wastes collected in the City of Willits were disposed at the Page Property. Initially, the chromic acid wastes were disposed along with the garbage, but later, pits were dug and the chromic acid was disposed into those pits. Industrial waste from the former Remco Hydraulics Facility were disposed at the Page Property until early 1974.

Some metal debris is evident at the site sticking out of the ground. Otherwise, the site is vacant and is used for cattle grazing. A spring exists at the base of the old burn dump that is contaminated with hexavalent chromium. The contaminated groundwater flows above the ground surface and discharges to Darby Creek. The area of the spring is fenced to prevent access to the contamination.

Soil and groundwater is contaminated with hexavalent chromium. Low levels of volatile organic compounds are also present in groundwater. To date, 18 groundwater monitoring wells have been installed to define the extent of the contamination. Concentrations of hexavalent chromium up to 237 parts per million (ppm) have been detected in groundwater monitoring well PPMW-1, in the vicinity of the former waste disposal pits.

Need for the Project

The WERT has been directed by staff of the Regional Water Board to abate the discharge of hexavalent chromium to Darby Creek, and the proposed project would enable the WERT to abate the discharge. Without the project, contamination will continue to discharge to Darby Creek. However, an NPDES Permit is needed to discharge the highly treated groundwater to surface waters. Compliance with CEQA is needed in order for the Regional Water Board to consider adoption of the NPDES permit.

Setting

The Page Property is located in the foothills surrounding Little Lake Valley, approximately three miles northeast of Willits, in Mendocino County, California. The property is located north of Canyon Road and is accessed via a gravel road and through a locked gate. The property is in a rural setting with surrounding properties consisting of residences and livestock ranches. The majority of the land surface at the property is covered with vegetation such as annual grasses and native trees.

The property is a rectangular parcel elongated in an east-west direction. The eastern portion of the property is relatively level and includes the highest topographic elevation on the property. The western portion of the property slopes steeply toward Darby Creek. Rubbish, metal and miscellaneous refuse associated with the former burn dump operation are visible on this western slope.

A V-shaped drainage exists on the western slope of the property. This drainage funnels shallow groundwater westerly through a relatively narrow area in the central portion of the property at the base of the western slope. Shallow groundwater migrates through the unconsolidated sediments in this area, just below the ground surface, and discharges to Darby Creek, which flows seasonally during the rainy season.

Bedrock outcrops intermittently on the ridges and in the proximity of the creek bottoms. Darby Creek flows seasonally and intermittently in a southerly direction, along a naturally occurring drainage route across the northwest corner of the Page property. Darby Creek continues approximately 1,200 feet south before trending to the west, where it is joined by an unnamed tributary (referred to as Page Creek). It then flows west and northwest, under Hearst Willits Road, until its surface flow terminates into Little Lake Valley. Darby Creek generally flows from late fall through spring.

Project Description

Shallow groundwater at the base of the former burn dump will be collected utilizing an interceptor trench installed across the base of the slope of the landfill approximately 35 feet east of Darby Creek. The trench will be installed perpendicular to lateral groundwater flow in the unconsolidated sediments. The bottom of the trench will be

keyed into bedrock. Bedrock is encountered near grade on both ends of the designed trench, and has been encountered at a depth of about 8 feet below ground surface (bgs) in the central area of the designed trench. The trench will be approximately 70 to 80 feet in length, gravel filled, with perforated piping installed to direct flow to a central sump. Impermeable material will be installed at the base of the trench and on the downgradient surface to ensure all of the flow is intercepted and directed to the trench sump. The land surface topography will remain unchanged during the interceptor trench installation, so that the rainfall surface run-off will not be collected. The intercepted shallow groundwater will be conveyed to the groundwater treatment system located near the former chromic acid disposal area.

Impacted water will be conveyed through one set of two granular activated carbon vessels reducing hexavalent chromium concentrations to below the detection limit of 1 ppb. The groundwater treatment system compound will be constructed in the approximately location shown on Figure F-1. The compound will consist of a 30 foot square concrete pad with an elevated curb. The concrete pad will be installed to provide a measure of secondary containment for the treatment equipment. Curb height and the resultant double containment volume, will be adequate to provide containment required per regulatory requirements. The treatment equipment will be placed on the concrete pad, and an insulated manufactured building will be constructed around the equipment compound. The manufactured building is necessary to protect the equipment from weather impacts. Two 7.5 foot swing doors will be installed on each side of the building for convenient access to the equipment. A float switch will be installed below the concrete curb to detect any flooding and or leaks and shut down the extraction pumps should a liquid level indicate that leakage has been detected.

The location of the treatment compound was selected so that access was readily available and so that discharge to Darby Creek would be efficient. The location of the compound is adjacent to the existing access road as shown on Figure F-1, and is also near existing overhead utility lines.

A process flow diagram for the treatment system is included as Figure F-4. The treatment system includes an influent holding tank, transfer pump, duplex bag filters, duplex carbon beds, and effluent holding tank, and one discharge pump.

Given the remote location of the site, the treatment system will be unmanned. However, an auto dialer will be installed to notify system operators if the system has shut itself down. Currently, it is assumed that weekly or bi-weekly operation and maintenance event will be conducted during the rainy season to check on system operation, record operational parameters, document flow discharged, and perform any required minor maintenance or repairs. System controls will consist of level controls in the extraction trench sump and both tanks, pressure switches on filters and treatment vessels, power surge and failure alarms and alarm condition level switches on the tanks and containment pad.

Issues Raised By the Public or Agencies

As of the date of this report, one member of the public has raised the concern with the discharge of hexavalent chromium to Darby Creek. No other issues have been raised by the public or from any agencies. However, Regional Water Board staff anticipates receiving public and agency comments regarding the proposed project. Each comment received will be evaluated and a response will be provided.

Permits Required

The following is a summary of the permits/requirements that may be needed for the project:

The WERT must comply with regulatory and permitting requirements including California State Water Resources Control Board Resolutions 92-49 and 68-16; Title 27, Division 2, California Code of Regulations; and any local, state and federal permitting requirements.

Waste Discharge Requirements which also serve as a National Pollutant Discharge Elimination System Permit are required to discharge highly treated groundwater to surface waters. In addition, a Monitoring and Reporting Program Order, included as part of the Waste Discharge Requirements, will be required to proceed with the project. The draft Waste Discharge Requirements Order No. R1-2006-0067 will be considered for adoption at a Regional Water Board meeting to be held on August 9, 2006.

Initial Study/Checklist

The attached checklist is taken from Appendix G of the State CEQA Guidelines. For each item, one of four responses is given:

No Impact: The project will not have an impact on the environment and therefore no impacts will be described.

Less Than Significant Impact: The project will have the impact described, but the impact will not be significant. Mitigation is not required, although the project applicant may choose to include mitigation measures to reduce the impacts.

Potentially Significant Unless Mitigated: The project will have the impact described, and the impact will be significant. One or more mitigation measures have been identified that will reduce the impact to a less than significant level.

Potentially Significant Impact: The project may have the impact described, and the impact is significant. The impact cannot be reduced to a less than significant level by incorporating mitigation measures. An environmental impact report must be prepared for this project.

Each question on the checklist was answered by evaluating the project as proposed in the Report of Waste Discharge, that is, without considering the effect of any added mitigation measures. As proposed in the Report of Waste Discharge, and as reflected in the proposed Waste Discharge Requirements, the project includes various constraints and conditions which reduce all potentially significant impacts to a no impact level. The checklist includes a discussion of the impacts that have been identified. Sources used in this Initial Study/Checklist are numbered and listed at the end of the Initial Study/Checklist.